

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-311-C**

IN RE:

Application of Sandhill Connexions, LLC for a Certificate)
of Public Convenience and Necessity to Provide)
Facilities-Based and Resold Local and Interexchange Voice)
Services, and for Alternative Regulation Pursuant to S.C.)
Code Ann. Sections 58-9-575 and 58-9-585 Within Certain)
Areas of the State of South Carolina)
_____)

MOTION FOR EXPEDITED REVIEW

Sandhill Connexions, LLC (“Sandhill”) hereby respectfully moves for expedited review of its Application for a Certificate of Public Convenience and Necessity (“CPCN”) to provide facilities-based and resold local and interexchange Internet Protocol (“IP”) voice services within certain areas of the State of South Carolina (“Application”). By its Application, Sandhill, a wholly-owned subsidiary of Sandhill Telephone Cooperative, Incorporated (“STCI”), proposes to offer facilities-based and resold, bundled local and long distance IP voice services to customers in the parts of Kershaw and Chesterfield Counties, South Carolina, that are outside of STCI’s existing authorized service areas, as well as expand into Darlington, Dillon, and Marlboro Counties, South Carolina, areas where STCI is not authorized to offer service (collectively, the “Proposed Service Areas”). Sandhill also requests that the Public Service Commission of South Carolina (the “Commission”) authorize implementation of an alternative regulatory plan for Sandhill’s local and interexchange service offerings pursuant to S.C. Code Ann. §§ 58-9-575 and 58-9-585 and the general regulatory authority of the Commission.

Sandhill requests that this matter be decided by the Hearing Examiner appointed to this matter at the earliest opportunity, and that the Hearing Examiner cancel the formal hearing on this matter, which is currently scheduled for November 14, 2016. This motion is made on the following grounds:

1. Sandhill published notice of the filing of its request in a newspaper of general circulation, as required by the Commission. The deadline to intervene in this matter was October 3, 2016.

2. The South Carolina Office of Regulatory Staff (“ORS”) is a statutory party to this action. *See* S.C. Code Ann. § 58-4-10(B). On October 17, 2016, the ORS filed a letter in this docket stating that it does not oppose the Commission granting Sandhill’s Application. Sandhill’s counsel has consulted with counsel for the ORS, and the ORS does not object to proceeding without a formal hearing in this matter.

3. Lancaster Telephone Company d/b/a Comporium (“Comporium”) intervened in the docket and is a party to this action. On October 12, 2016, Comporium filed a Stipulation agreed to and signed by Comporium and Sandhill on October 12, 2016, in which Comporium stated that, as a consequence of the stipulations and conditions in the Stipulation, Comporium does not oppose Sandhill’s Application. Sandhill’s counsel has consulted with counsel for Comporium, and Comporium does not object to proceeding without a formal hearing in this matter.

4. No other comments or petitions to intervene were received in response to the notice. Thus, all interested persons have been afforded an opportunity for a hearing, as required by S.C. Code Ann. § 58-9-280(B), Section 1-23-320(a) of the South Carolina Administrative Procedures Act, and constitutional due process. Proceeding without a

formal hearing in this matter would serve the public interest in administrative efficiency.

5. Sandhill is a private company that was organized in the state of South Carolina on July 24, 2013. Sandhill is located at 122 S. Main Street, Jefferson, SC 29718. Sandhill is a wholly-owned subsidiary of STCI, a South Carolina corporation, also located at 122 S. Main Street, Jefferson, SC 29718. STCI is an incumbent local exchange carrier and has been providing local exchange service in South Carolina since 1955. Another affiliated company, Sandhill Communications, LLC, was granted a certificate of public convenience and necessity to provide intrastate interexchange telecommunications services in the State of South Carolina, and has been providing those services since 1999. *See* Order Nos. 1999-618 and 1999-657 in Docket No. 1999-308-C. STCI, and therefore Sandhill, through its relationship as a wholly-owned subsidiary of STCI, retains key management and technical personnel with significant business and telecommunications experience. STCI, and therefore Sandhill, through its relationship as a wholly-owned subsidiary of STCI, has sufficient financial resources to operate in South Carolina. Sandhill, through its relationship as a wholly-owned subsidiary of STCI, has demonstrated that it has the technical, financial, and managerial resources sufficient to provide the requested services within the Proposed Service Areas of the State of South Carolina, and that Sandhill meets all other requirements of certification, as demonstrated in Sandhill's Application, specifically in the consolidated financial statements of STCI, Sandhill's parent company (Exhibit C, Sandhill's Consolidated Financial Statements) and in the list and summary of key personnel of STCI, who also provide services to Sandhill (Exhibit D, Sandhill's Summary of Experience of Key Personnel) attached to the Application, as well as in the Verified Direct Testimony of C. Lee Chambers, filed in this

docket on October 14, 2016.

6. The Commission is familiar with the operations and standing of Sandhill's parent company, STCI, and STCI's affiliated companies.

7. Mr. Chambers's Verified Direct Testimony in this docket, and the Exhibits filed with the Application, demonstrate that Sandhill's request for a Certificate of Public Convenience and Necessity in the Proposed Service Areas and other relief, as requested in the Application, is warranted and that approval of the Application is in the public interest.

WHEREFORE, for the reasons stated above, Sandhill Connexions, LLC respectfully requests that the Hearing Examiner grant its request for expedited review of its Application for a Certificate of Public Convenience and Necessity in this matter, that

the Application be approved at the Hearing Examiner's earliest convenience, and that the formal hearing on this matter be cancelled.

By: 
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Columbia, South Carolina
October 18, 2016

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Carrie L. DeVier, hereby certifies that she is employed by the law firm of Herman & Whiteaker, LLC as attorneys for Sandhill Connexions, LLC and that she has caused the Motion for Expedited Review in Docket No. 2016-311-C to be served by United States Postal Service, first class postage prepaid and affixed thereto, and addressed to the following on October 18, 2016:

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